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Reply to: NY Office

October 16, 2023

### LETTER-MOTION – FILED VIA ECF

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 2204  
New York, NY 10007

**Re: *Karen Williams Design, Ltd. v. E. Lawrence Design, LLC, et al.***  
**Civil Action No. 1:23-cv-06634-PGG**  
**Letter-Motion for Adjournment of Pretrial Conference**

Dear Judge Gardephe,

We represent the Plaintiff, Karen Williams Design, Ltd. (“Plaintiff”), in the above-referenced action. Pursuant to Paragraph I[E] of Your Honor’s Individual Rules of Practice in Civil Cases, and with the consent of counsel for Defendant, E. Lawrence Design, LLC (“Defendant ELD”), we write to respectfully request an adjournment of the Pretrial Conference presently scheduled for November 2, 2023, pursuant to Your Honor’s Notice of Pretrial Conference entered on August 1, 2023 (Dkt. 7).

The bases for this request are as follows. First, Defendant ELD agreed to waive service of process today pursuant to Fed. R. Civ. P. 4[d], which set its deadline to answer or otherwise respond to Plaintiff’s complaint at December 11, 2023 (*see* Dkt. 14) – meaning that Defendant ELD will not appear in this action until that date, over a month after the November 2, 2023 date on which the Pretrial Conference is presently scheduled.

Second, Plaintiff is still in the process of completing service of process upon the other named defendants in this action, New Day Woodwork, Inc. (“Defendant NDW”) and RBL Metals, LLC (“Defendant RBL”), meaning that it is unlikely that those parties will appear in this action before the November 2, 2023 date on which the Pretrial Conference is presently scheduled.

And third, counsel for Defendant ELD has advised that he will be traveling during the week of November 2, 2023, meaning that he is unavailable to attend the Pretrial Conference on behalf of his client on that date.

Plaintiff and Defendant ELD would respectfully propose that the Pretrial Conference be rescheduled for Thursday, December 14, 2023.

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Hon. Paul G. Gardephe  
October 16, 2023  
Page 2 of 2

This is the parties' first request for an adjournment of the Pretrial Conference. Defendant ELD, through counsel, has consented to this request. As Defendant NDW and Defendant RBL have not yet been served or appeared in this action, their consent to this request has not been obtained.

Thank you for your time and consideration.

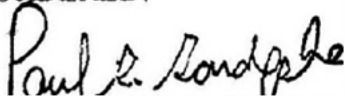
Very truly yours,



Alexander Malbin, Esq.  
FERDINAND IP LAW GROUP  
*Counsel for Plaintiff,*  
*Karen Williams Design, Ltd.*

**MEMO ENDORSED:** It is hereby ORDERED that the conference in this matter currently scheduled for November 2, 2023, is adjourned to **Thursday, December 14, 2023, at 12:30 p.m.**

SO ORDERED.



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Paul G. Gardephe  
United States District Judge  
Dated: October 18, 2023